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CLERK US DISTRICT COURT  
DISTRICT OF ARIZONA

GARY M. RESTAINO  
United States Attorney  
District of Arizona  
ANGELA W. WOOLRIDGE  
Assistant United States Attorney  
Arizona State Bar No. 022079  
United States Courthouse  
405 W. Congress Street, Suite 4800  
Tucson, Arizona 85701  
Telephone: 520-620-7300  
Email: angela.woolridge@usdoj.gov  
Attorneys for Plaintiff

**CR21-03061 TUC-JGZ(LAB)**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Jacob Allen Etchart, Sr.,

Defendant.

No.

**INDICTMENT**

VIO: 18 U.S.C. §§ 922(a)(1)(A) &  
924(a)(1)(D)  
(Engaging in the Business of Dealing  
Firearms Without a License)  
Count 1

18 U.S.C. §§ 922(a)(6) & 924(a)(2)  
(Making False Statements in  
Connection with Acquisition of  
Firearm)  
Count 2

18 U.S.C. § 924(d); and 28 U.S.C. §  
2461(c)  
(Forfeiture Allegation)

**THE GRAND JURY CHARGES:**

**COUNT 1**

From on or about March 12, 2020, to on or about January 6, 2021, in the District of Arizona, Defendant JACOB ALLEN ETCHART, SR., not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing firearms.

In violation of Title 18, United States Code, 922(a)(1)(A) and 924(a)(1)(D).

**COUNT 2**

On or about December 17, 2020, in the District of Arizona, Defendant JACOB ALLEN ETCHART, SR., in connection with the attempted acquisition of a firearm, to wit: a Century Arms model VSKA 7.62x39mm caliber rifle, from Trail Boss Outfitters L.L.C., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Trail Boss Outfitters L.L.C., which statement was intended and likely to deceive Trail Boss Outfitters L.L.C. as to a fact material to the lawfulness of such sale, in that Defendant JACOB ALLEN ETCHART, SR., stated that he was the actual transferee/buyer of the firearm when in fact he was acquiring the firearm on behalf of another person.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**FORFEITURE ALLEGATION**

Upon conviction of Counts One and Two of this Indictment, the defendant, JACOB ALLEN ETCHART, SR., shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any firearms involved in the commission of the offense, including, but not limited to:

1. Mossberg model 500A 12 gauge shotgun, SN: P527721
2. Glock Inc. model 19 9mm pistol, SN: VFK707
3. Harrington & Richardson 1871 Inc. model Pardner 12 gauge shotgun, SN: NZ706044
4. Colt model Woodsman .22 caliber pistol, SN: 189109-S
5. Winchester model 290 .22 caliber rifle, SN: B1786344
6. Anderson Manufacturing model AM-15 multi-caliber rifle, SN: 15278467
7. Smith & Wesson model M&P 15 .223 caliber rifle, SN: SW86372
8. Ithaca Gun Co. model 37 Featherlight 12 gauge shotgun, SN: 371713291
9. Palmetto State Armory model KS47 multi-caliber pistol, SN: KSB001069
10. Remington Arms Company, Inc. model M887 12 gauge shotgun, SN: AAE048859A
11. Heckler & Koch Inc. model VP9 9mm pistol, SN: 224047444
12. Glock Inc. model 19 9mm pistol, SN: BEZ313US

- 1 13. Ruger model Ruger-57 .57 caliber pistol, SN: 64157479
- 2 14. Keltec, CNC Industries, Inc. model KSG 12 gauge shotgun, SN: XX4U24
- 3 15. Taurus model PT1911 .45 caliber pistol, SN: NBS50810
- 4 16. Aero Precision model M5 multi-caliber pistol, SN: US87249
- 5 17. Glock model GMBH 35 .40 caliber pistol, SN: LFN350
- 6 18. Romarm/Cugir model FPK Paratrooper 7.62x39mm rifle, SN: PT-000416-19RO
- 7 19. Glock Inc. model 22 .40 caliber pistol, SN: HRS161
- 8 20. Diamondback Arms Inc. model DB-15 multi-caliber pistol, SN: DB1524767
- 9 21. Henry Repeating Rifle Company model H001L .22 caliber rifle, SN: C050013H
- 10 22. Microtech Small Arms Research model STG-556 .223 caliber rifle, SN: 600P001748
- 11 23. Century Arms International model VZ2008 Sporter 7.62x39mm rifle, SN: VZ06PM-
- 12 012860
- 13 24. Aero Precision model X15 multi-caliber pistol, SN: X092400
- 14 25. Savage model Mark II .22 caliber rifle, SN: 3531778
- 15 26. Aero Precision model X15 multi-caliber pistol, SN: AR11078
- 16 27. Federal Armament, LLC (FedArm) model FP-15 multi-caliber pistol, SN: P00248
- 17 28. PWS (Primary Weapon Systems) model PCC-9 9mm pistol, SN: PC00852
- 18 29. Palmetto State Armory model KS47 7.62x39mm rifle, SN: KS000913
- 19 30. Romarm/Cugir model Mini Draco 7.62x39mm pistol, SN: PE-5062-2018RO
- 20 31. Smith & Wesson model M&P 9C 9mm pistol, SN: DXH2248
- 21 32. Smith & Wesson model 728 .38 caliber revolver, SN: V725050
- 22 33. Sears/Ted Williams model 3T .22 caliber rifle, SN: R344138
- 23 34. Aero Precision model M4E1 multi-caliber rifle, SN: M40091711
- 24 35. Walter model P22 .22 caliber pistol, SN: WA002909
- 25 36. Walter model P22 .22 caliber pistol, SN: L284460
- 26 37. Springfield Armory, Geneseo, IL model XDS .45 caliber pistol, SN: S3343377
- 27 38. Colt model Colt Auto .25 caliber pistol, SN: OD32441
- 28 39. Savage model 1917 .32 caliber pistol, SN: 245546

- 1 40. Luger model Gesichart 9mm pistol, SN: 78560
- 2 41. Luger model Gesichart 9mm pistol, SN: 9885
- 3 42. North American Arms (model unknown) .22 caliber pistol, SN: E172257
- 4 43. DPMS Inc. (Defense Procurement MFG. Services) model A15 .223 caliber rifle, SN:
- 5 P026532K
- 6 44. Colt model Python .357 caliber revolver, SN: K25270
- 7 45. Glock Inc model 35 .40 caliber pistol, SN: WUZ246
- 8 46. Outbreak Ordnance LLC. Big Pine Key, FL model Ordnance One multi-caliber rifle,
- 9 SN: ORD0247
- 10 47. Aero Precision model X15 multi-caliber pistol, SN: USA33717
- 11 48. Joe Bob Outfitters model LLC ML-9 multi-caliber pistol, SN: KS9-00208
- 12 49. CZ (Ceska Zbrokovka) model CZ P-07 9mm pistol, SN: B917304
- 13 50. CZ (Ceska Zbrokovka) model CZ75 P-09 9mm pistol, SN: B932248
- 14 51. Heckler & Koch Inc. model VP9 9mm pistol, SN: 224-210732
- 15 52. Glock Inc. model 19 9mm pistol, SN: ACKZ351
- 16 53. Springfield Armory, Geneseo, IL model XD-40 .40 caliber pistol, SN: XD457426
- 17 54. Century Arms International model Draco NAK9 9mm pistol, SN:
- 18 R0NVMB111814445
- 19 55. Heckler and Koch model VP9 SK 9mm pistol, SN: 232-040609
- 20 56. Heckler and Koch model VP9 SK 9mm pistol, SN: 232-040598
- 21 57. CZ USA model P10C 9mm pistol, SN: C472494
- 22 58. Glock Inc model 19 9mm pistol, SN: VFK708
- 23 59. Savage model 10 .308 caliber rifle, SN: K328757
- 24 60. Smith & Wesson model 66 .357 caliber revolver, SN: AJA9976
- 25 61. Smith & Wesson model 622 .22 caliber pistol, SN: TCP9096
- 26 62. Ruger model Mark II Target .22 caliber pistol, SN: 221-14432
- 27 63. Zeus Arms (Ammo A-Z LLC) model Magnum 12 gauge shotgun, SN: A00417
- 28 64. I O Inc. (Inter Ordnance) model Sporter 7.62x39mm rifle, SN: F04337

- 1 65. Aresenal Co. Bulgaria model SAM7SF 7.62x39mm rifle, SN: BE532527
- 2 66. CZ (Ceska Zbrojovka) model CZ455 .22 caliber rifle, SN: C400363
- 3 67. Norinco (North China Industries) model Clayco Sports M4 .22 caliber rifle, SN:
- 4 8303165
- 5 68. Mauser model 1895 7.62x39mm rifle, SN: K7557
- 6 69. Winchester model 290 .22 caliber rifle, SN: 695542
- 7 70. Remington Arms Company, Inc. model 597 .22 caliber rifle, SN: D2928860
- 8 71. Century Arms International model Draco 9mm pistol, SN: RONVMB71706175
- 9 72. I O Inc. (Inter Ordnance) model Shadow 15 multi-caliber pistol, SN: SDW00196
- 10 73. Bear Creek Arsenal model BCA15 multi-caliber rifle, SN: 13190
- 11 74. Bear Creek Arsenal model BCA15 multi-caliber rifle, SN: 13831
- 12 75. Ruger model 10/22 .22 caliber rifle, SN: 129-88042
- 13 76. Radical Firearms, LLC model RF-15 multi-caliber rifle, SN: 19-00072
- 14 77. National Ordnance model 1903A3 .30-06 caliber rifle, SN: 5007985
- 15 78. F.N. (FN Herstal) model PS90 .57 caliber rifle, SN: FN124096
- 16 79. Palmetto State Armory model KS47 7.62x39mm rifle, SN: KS000911
- 17 80. Black Weapons Armory, LLC model BWA-15 multi-caliber rifle, SN: ASA10232
- 18 81. American Tactical Imports model ATI AT-477.62x39mm rifle, SN: FS001960
- 19 82. Century Arms International model SAR-1 7.62x39mm rifle, SN: S1766992003
- 20 83. Palmetto State Armory model PA-X9 multi-caliber pistol, SN: G00670
- 21 84. Arsenal Inc. model Saiga 7.62x39mm rifle, SN: L09105800
- 22 85. FEG model SA2000M 7.62x39mm rifle, SN: EE7708H
- 23 86. Ewbank Manufacturing model EMAKM 7.62x39mm pistol, SN: 000027
- 24 87. Anderson Manufacturing model AM-15 multi-caliber rifle, SN: 16154493
- 25 88. Marlin Firearms Co. model 60 .22 caliber rifle, SN: 08321288
- 26 89. Harrington & Richardson model Topper 58 410 gauge shotgun, SN: AN219302
- 27 90. Norinco (North China Industries) model SKS 7.62x39mm rifle, SN: 11542321
- 28 91. Ruger model 22 Charger .22 caliber pistol, SN: 491-04816

- 1 92. Gaucher Armes S.A. model Stoeger Coachgun 20 gauge shotgun, SN: 433581
- 2 93. Aero Precision model X15 multi-caliber rifle, SN: X085352
- 3 94. Czech Small Arms SA model VZ61 .765 caliber pistol, SN: 6101910
- 4 95. Czech Small Arms SA model VZ61 9mm pistol, SN: 69M00587
- 5 96. Para-Ordnance MFG. Inc. model Hi Cap .40 caliber pistol, SN: P181872
- 6 97. Smith & Wesson model M&P 15 .545 caliber rifle, SN: SM57281
- 7 98. Keltec, CNC Industries, Inc. model PLR-22 .22 caliber pistol, SN: U0113
- 8 99. R&R Enterprises model AR15 multi-caliber rifle, SN: 35214
- 9 100. Ruger model Mini 14 .223 caliber rifle, SN: 185-33206
- 10 101. Keltec, CNC Industries, Inc. model RDB .556 caliber rifle, SN: Z3Y87
- 11 102. Keltec, CNC Industries, Inc. model RDB .556 caliber rifle, SN: Z2V37
- 12 103. High Standard model HD Military .22 caliber pistol, SN: 152800
- 13 104. FNH USA, LLC model FNP45 .45 caliber pistol, SN: 61DMN03373
- 14 105. Para USA, INC. model Hi CAP .45 caliber pistol, SN: P236908
- 15 106. Smith & Wesson model SW1911 .45 caliber pistol, SN: JRK1442
- 16 107. Franchi model 500 12 gauge shotgun, SN: M32797
- 17 108. Mossberg model 500 12 gauge shotgun, SN: P992766
- 18 109. Springfield Firearms Corporation model M Stevens Co 12 gauge shotgun, SN:
- 19 F17195
- 20 110. DPMS Inc. (Defense Procurement MFG. Services) model A-150 7.62x39mm rifle,
- 21 SN: F135435
- 22 111. DPMS Inc. (Defense Procurement MFG. Services) model LR-308 .308 caliber rifle,
- 23 SN: 31010
- 24 112. IAC model 87-1 12 gauge shotgun, SN: 0800640
- 25 113. Ithaca Gun Co. model 37 Featherlight 12 gauge shotgun, SN: 371312745
- 26 114. Hesse LTD model 47 7.62x39mm rifle, SN: K005744
- 27 115. Norinco (North China Industries) model NHM90 7.62x39mm rifle, SN: 029371
- 28 116. Armsan Silah Sanayi model Tristar 20 gauge shotgun, SN: A05974



- 1 117. Century Arms International model Tantal Sporter .545 caliber rifle, SN: Y002990
- 2 118. Sig Sauer (Sig-Arms) model Sig 556 .556 caliber rifle, SN: JS017874
- 3 119. Rossi model 625A .22 caliber rifle, SN: G257817
- 4 120. Norinco (North China Industries) model Mak90 7.62x39mm rifle, SN: 94109089
- 5 121. Sig Sauer (Sig-Arms) model P556 .556 caliber pistol, SN: TQ000157
- 6 122. A&LS model RGS 7.62x39mm rifle, SN: 1972EA1456
- 7 123. Spike's Tactical LLC model SL15 multi-caliber rifle, SN: 00669
- 8 124. Ithaca Gun Co. model 37 12 gauge shotgun, SN: 371502534
- 9 125. Winchester model 1894 .30-30 caliber rifle, SN: AC1313
- 10 126. Colt model Competition .223 caliber rifle, SN: CCH037235
- 11 127. New England Firearms model Pardner 12 gauge shotgun, SN: NX511189
- 12 128. Century Arms International model AMD65 7.62x39mm rifle, SN: AMD6501232
- 13 129. Century Arms International ARMS International model Tantal Sporter .545 caliber
- 14 rifle, SN: TTL-C01744
- 15 130. Century Arms International model M70AB2 7.62x39mm rifle, SN: M70AB28579
- 16 131. Sig Sauer (Sig-Arms) model 1911 .45 caliber pistol, SN: 54B001611
- 17 132. Polymer80, Inc. (P80 Tactical P80) model 22 .40 caliber pistol CAL:40 (SN
- 18 unknown)
- 19 133. Century Arms model VSKA 7.62x39mm caliber rifle SN: SV7040016

20 If any of the property described above, as a result of any act or omission of the  
21 defendant: a) cannot be located upon the exercise of due diligence; b) has been transferred  
22 or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of  
23 the court; d) has been substantially diminished in value; or e) has been commingled with  
24 other property which cannot be divided without difficulty, it is the intent of the United  
25 States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title  
26 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said  
27 defendant up to the value of the above forfeitable property, including, but not limited to,  
28 all property, both real and personal, owned by the defendant.

1 All pursuant to Title 18, United States Code, Section 924(d); Title 28, United States  
2 Code, Section 2461(c); and Rule 32.2(a), Federal Rules of Criminal Procedure.

3 A TRUE BILL

4 /S/

5  
6 FOREPERSON OF THE GRAND JURY  
Dated: December 1, 2021

7 GARY M. RESTAINO  
United States Attorney  
8 District of Arizona

9 /S/

**REDACTED FOR  
PUBLIC DISCLOSURE**

10 ANGELA W. WOOLRIDGE  
11 Assistant U.S. Attorney  
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